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GEORGIA M. PESTANA

Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

W. Simone Nicholson
Special Assistant Corporation Counsel
Office: (212) 356-2394
Mobile: (646) 391-6899

MEMO ENDORSED

October 26, 2021

VIA ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: V.K. v. Dep't of Educ. 21-cv-06855

OK. Conference adjourned
to 12/2/21 @ 10:15 a.m.

Colleen McMahon
10/27/2021

Dear Judge McMahon:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. 1400, et. seq., as well as for this action.

In the interest of conserving court resources, I write to request a one-month adjournment of the initial conference scheduled for October 28, 2021 to allow Plaintiff's counsel time to produce the billing records at issue and to enable the parties to begin to discuss resolution of this matter. Plaintiff consents to this request, and this is the first request for an adjournment of the Initial Conference.

Accordingly, Defendant respectfully requests the initial conference be adjourned to November 30, 2021 (to accommodate the Thanksgiving Holiday), or a date thereafter convenient to the Court.

Thank you for your time and attention to this matter.

Respectfully submitted,

Simone Nicholson

/s/

Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)